

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

October 15, 2021

Nathan Ochsner, Clerk of Court

United States of America
v.
Angel Adrian MIGUEL-Contreras
YOB: 1997
COB: Mexico

Case No. M-21- 2184-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/14/2021 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 U.S.C 1324(a)(1)(A)(ii)

Offense Description

Knowingly or in reckless disregard of the fact that Santiago Jimenez-Garcia, a citizen and national of Mexico, along with three (3) other undocumented aliens, for a total of four (4), who had entered the United States in violation of law, did knowingly transport and move, or attempt to transport and move, by foot said aliens in furtherance of such violation of law within the United States, that is, from a location near Abram, Texas to an unknown location.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved: M. Redavid, AUSA

Submitted by reliable
electronic means, sworn to
and attested telephonically
per Fed.R.Cr.P.4.1, and
probable cause found on:
Date:

October 15, 2021 4:11 PM

City and state: McAllen, Texass/Fatima Alkhatib

Complainant's signature

Fatima Alkhatib Special Agent

Printed name and title



Judge's signature

Nadia Medrano, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On October 14, 2021, U.S. Customs and Border Protection (CBP) Office of Border Patrol (OBP) Agents working in the McAllen, Texas Zone 7 Area of Responsibility (AOR) apprehended a group of 5 undocumented non-citizens (UNCs) in the brush near Abram, Texas. All 5 UNCs admitted to being citizens and nationals of Mexico without authorization to be in the U.S. They were transported to the Hidalgo, Texas Port of Entry (POE) for processing.

On October 14, 2021, Homeland Security Investigations (HSI) Special Agents (SAs) and Border Patrol Agents (BPAs) responded to the Hidalgo, Texas POE to interview the group.

Principal Statement:

After a post Miranda interview, Angel Adrian MIGUEL-Contreras admitted to being the brush guide for the group. MIGUEL-Contreras admitted that he was going to be paid \$200 per UNC by an unknown individual. MIGUEL-Contreras admitted to having successfully guided approximately 12 UNCs into the U.S. on prior occasions, receiving approximately \$2400 USD. MIGUEL-Contreras stated that he was taking the 4 UNCs he was apprehended with to an unknown location where they would be picked up by other individuals.

Material Witness Statement:

Santiago Jimenez-Garcia, one of the UNCs apprehended with the group, stated that he was travelling to McAllen, Texas to seek employment. Jimenez-Garcia was told by the brush guide that there were employment opportunities in McAllen, Texas. Jimenez-Garcia was charged \$70,000 Mexican pesos in smuggling fees to enter the U.S. Jimenez-Garcia was given a green bracelet by the brush guide while in Mexico for identification purposes.

Jimenez-Garcia identified MIGUEL-Contreras from a photo lineup as the brush guide who guided them from the river into the U.S.